

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN RE:	§		
	§		
REMARKABLE HEALTHCARE OF CARROLLTON, LP	§	Case No.	18-40295
	§		
	§		
REMARKABLE HEALTHCARE OF DALLAS, LP	§	Case No.	18-40296
	§		
	§		
REMARKABLE HEALTHCARE OF FORT WORTH, LP	§	Case No.	18-40297
	§		
	§		
REMARKABLE HEALTHCARE OF SEGUIN, LP	§	Case No.	18-40298
	§		
	§		
REMARKABLE HEALTHCARE, LLC	§	Case No.	18-40300
	§		
	§		
DEBTORS.	§	Joint Administration Requested	
	§	Under Case No. 18-40295	

**DECLARATION OF LAURIE BETH McPIKE IN SUPPORT OF THE REMARKABLE
DEBTORS' MOTION FOR INTERIM AND FINAL ORDERS AUTHORIZING THE
USE OF CASH COLLATERAL AND GRANTING ADEQUATE PROTECTION**

1. My name is Laurie Beth McPike. I am over twenty-one (21) years of age, of sound mind, and fully capable of making this declaration under the penalty of perjury in support of the Debtors' Motion for Interim and Final Orders Authorizing the Use of Cash Collateral and Granting Adequate Protection (the "Motion"). I have never been convicted of a felony or any crime involving moral turpitude.

2. I am the President of the General Partner of the four limited partnerships Debtors¹ and Managing Member of Remarkable Healthcare, LLC (collectively, the Remarkable Debtors”) and all of the facts set forth herein are within my personal knowledge, unless stated otherwise, and are true and correct.

3. The Remarkable Debtors were formed in Texas from 2010 to 2013 and operate several skilled nursing facilities with hundreds of resident patients and employees located in Prestonwood, Dallas, Fort Worth, and Seguin. Remarkable Healthcare is focused on the individual who needs healthcare services after his/her hospital stay and offers both services to help individuals return home to the community as well as long term services for those who require extended care. Services are tailored to each individual with the goal of facilitating increased strength and flexibility while minimizing pain and impairment. Stabilizing the patient from a clinical, nursing, and social aspect is Remarkable Healthcare’s top priority.

4. The names and addresses of the creditors holding or asserting an interest in the Remarkable Debtors’ cash collateral are:

- a. Comerica Bank 6260 East Mockingbird, Dallas, TX 75214;
- b. Montgomery Capital Partners, 2500 Dallas Parkway, Suite 300, Plano, TX 75093;
- c. Southern Dallas Development Fund, Inc, 400 S. Zang Blvd, Suite 1210, Dallas, TX 75208; and
- d. PeopleFund, 2721 E. 17th Street, Bldg. D, Suite 1, Austin, TX 78702

5. The Remarkable Debtors, through their counsel, have attempted to contact the affected creditors and/or their attorneys, where known, with regard to the Motion, by phone, email,

¹ Remarkable Healthcare of Carrollton, LP, Remarkable Healthcare of Dallas, LP, Remarkable Healthcare of Fort Worth, LP, and Remarkable Healthcare of Seguin, LP

and/or fax where known, and in the absence of phone, email, or facsimile, by U.S. mail as set forth in the certificate of conference of the Motion.

6. The Remarkable Debtors face immediate and irreparable harm to their estates that will occur if the use of Cash Collateral is not immediately approved on an interim basis. The Remarkable Debtors are concerned that the value of their assets and businesses will be diminished and remaining operations will be disrupted by (a) loss of employees if payroll is not paid, (b) loss of operations if utilities are not paid, (c) harm to patients if operational costs are not paid, and (d) loss of the ability to orderly reorganize if business is disrupted.

7. The Secured Creditors to the Cash Collateral will have adequate protection in the following ways:

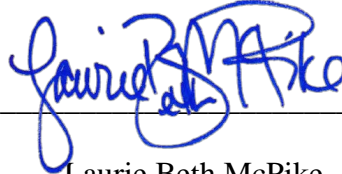
- **Replacement Liens:** The Secured Creditors shall be granted a general and continuing lien upon and security interest in and to all of the Remarkable Debtors' right, title, and interests in, to, and against the Secured Creditors' collateral, acquired by the Remarkable Debtors after the Petition Date.
- **Court Records:** As part of the adequate protection provided to the Secured Creditors, the Remarkable Debtors shall submit to the Secured Creditors copies of all monthly reports required to be made to the United States Trustee, all filings made by the Remarkable Debtors with the Court, and all notices of hearings in this Reorganization Cases.
- **Bank Accounts:** The Remarkable Debtors shall maintain their Debtor-in-Possession accounts in accordance with the orders of this Court applicable thereto and/or in accordance with the regulations of the Office of the United States Trustee.
- **Budgets:** The Remarkable Debtors shall only use the Cash Collateral in accordance with court-approved budgets.
- **Insurance:** The Remarkable Debtors shall give the Secured Creditors proof of insurance coverage and maintain same on the tangible portions of the Collateral.
- **Taxes:** The Remarkable Debtors intend to stay current on all post-petition tax obligations.

8. I have reviewed the 14-day and 30-day budgets attached to the Motion as Exhibits A & B and verify that they are true and correct to the best of my knowledge.

9. I reserve the right to amend, modify, or supplement this Declaration should new information become available to me.

10. I declare under penalty of perjury under the laws of the United States of America
that the foregoing is true and correct.

Dated: February 13, 2018



Laurie Beth McPike